

RECEIVED  
FEDERAL ELECTION  
COMMISSION**BY EMAIL AND FIRST CLASS MAIL**

2015 DEC 35 AM 11:08

Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

OFFICE OF COUNSEL

RE: MURs 6917 & 6929 – Scott Walker Inc.

Dear Mr. Jordan:

Scott Walker Inc. is submitting the enclosed response in relation to the Federal Election Commission's ("Commission") letter dated November 3, 2015 and received November 9, 2015. The letter asked Scott Walker Inc. to respond to complaints filed in MURs 6917 and 6929.

Per our conversation on November 23, 2015 and subsequent email message from Kim Collins, Scott Walker Inc. was granted an extension through December 24, 2015.

Thank you for your attention to this response.

Respectfully Submitted,



Jonathan J. Waclawski  
Scott Walker Inc., Counsel

## BEFORE THE FEDERAL ELECTION COMMISSION

## MURS 6929 & 6917

**RESPONSE OF SCOTT WALKER INC., KATE LIND, AS  
TREASURER**

On behalf of Scott Walker Inc., Kate Lind, as Treasurer, this responds to the letter from the Federal Election Commission dated November 3, 2015 asking Scott Walker Inc. to respond to the complaints and supplemental complaints filed against other parties in the above captioned matters. Scott Walker Inc., Governor Walker's principle campaign committee, is named in none of them.

The complaints in MURs 6917 and 6929 along with a supplemental complaint in MUR 6917 were filed by similarly situated ideological entities and raise the same, but meritless, allegations based on similar circumstances and, as such, Scott Walker Inc. is submitting one response to the complaints. For the reasons set forth below, the Commission should find no reason to believe, dismiss the matters, and close both files as applied to Scott Walker Inc.

Scott Walker Inc. is in full compliance with the Federal Election Campaign Act (FECA) and FEC regulations, as the timeline of the organization's registration and reporting shows. Scott Walker Inc. filed its Statement of Organization (FEC Form 1) on

July 2, 2015, establishing the committee as the principal campaign committee for Governor Scott Walker's presidential campaign.<sup>1</sup> Importantly, July 2, 2015 was the same day Governor Walker submitted to the FEC, a letter stating he "had received contributions of more than \$5,000 within the last 15 days."<sup>2</sup> Both filings took place 11 days prior to Governor Walker's July 13, 2015 public candidacy announcement.<sup>3</sup>

Candidates for federal office have 15 days from the time they accept contributions or make expenditures in excess of \$5,000 for the purpose of influencing a federal election. 52 U.S.C. § 30102(e)(1); 11 C.F.R. § 101.1. Further, a principal campaign committee acting on behalf of a federal candidate must file a Statement of Organization with the FEC within 10 days of the candidate filing its Statement of Candidacy. 52 U.S.C. § 30103. Governor Walker's letter and Scott Walker Inc.'s corresponding Statement of Organization timely complied with the above noted requirements, since both were executed on the same day - well within the 10 day filing window for principal campaign committees.

Further demonstrating that Scott Walker Inc. operated in compliance with FECA and the Commission's Regulations is the fact that all funds received and expenditures made beginning on June 17, 2015 were properly reported in Scott Walker Inc.'s 2015 third quarter report filing to the FEC.<sup>4</sup> June 17, 2015 marked the initial date on which

---

<sup>1</sup> On September 21, 2015 Governor Walker publicly announced the suspension of his presidential campaign. As such, Scott Walker Inc. is no longer acting to further Governor Walker's presidential campaign, but is instead working to retire its debts so that it may terminate as soon as practicable.

<sup>2</sup> Governor Walker's letter to the FEC noted the fact that he had not yet announced his candidacy for president, but was filing the letter in lieu of FEC Form 2 in order to comply with the Federal Election Campaign Act. See 2 U.S.C. § 432(e)(1); 11 C.F.R. § 100.3(a)(1).

<sup>3</sup> See Patrick Healy, Scott Walker Enter 2016 Presidential Race, Pledging Conservative Agenda, *New York Times*, July 13, 2015, available at [http://www.nytimes.com/2015/07/14/us/politics/scott-walker-presidential-campaign.html?\\_r=0](http://www.nytimes.com/2015/07/14/us/politics/scott-walker-presidential-campaign.html?_r=0)

<sup>4</sup> Scott Walker Inc.'s first report to the FEC included all contributions received and expenditures made during the time period in which Governor Walker was testing the waters – June 17, 2015 – July 2, 2015.

funds were received and expenditures were made to explore the viability of a Governor Walker campaign for president.

Scott Walker Inc. is the principal campaign committee for Governor Walker's campaign for President of the United States. When Scott Walker Inc. filed its Statement of Organization with the FEC, it was well within the time period allowed by statute and regulation. Therefore, any attempt to assert Scott Walker Inc. is in violation of FECA for improperly registering with the FEC is unfounded. Scott Walker Inc. respectfully requests the Commission find no reason to believe that a violation occurred and that these matters be dismissed as applied to Scott Walker Inc.

Dated: 12/21/15

By:



Jonathan J. Waclawski, Counsel